Approved by
OMB[1] Control No.:
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02/28/2023

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM
QUESTIONNAIRE

Reporting Period: April 2016- January 2021

Note: If there has been no change in the response to a specific question since the last IMPEP questionnaire, the State or Region may copy the previous answer, if appropriate.

A. GENERAL

1. Please prepare a summary of the status of the State's or Region's actions taken in response to each of the open recommendations from previous IMPEP reviews.

2016 IMPEP Recommendation: The review team recommends that the Division perform an evaluation to determine the causes for the low staff retention rate and implement corrective actions to mitigate the causes.

During the periodic review, we addressed this recommendation. We conducted interviews and evaluated the statewide salary structure in consultation with human resources to determine the causes for the low staff retention rate. Although we did not produce a written report of their evaluation; ultimately, we reported that the main cause for the low staff retention rate was “the staff was overworked and underpaid.” We are working to mitigate both aspects of the main cause by trying to increase salaries and reduce workload. The review of the statewide salary structure indicated that we had not taken advantage of the current salary structure such that it benefitted our technical staff. As a result, our staff received a pay raises in January 2018, July 2018, July 2019 and July 2020. We also modified the career ladder by creating two Environmental Scientist 4 (ES-4) positions. Previously, the highest Environmental Scientist position was an ES-3. Two ES-3 staff members were promoted into ES-4 positions. We believe this provides more opportunities for staff to advance and receive higher salaries.

We have decreased workload by reducing the number of internal metrics applied to the licensing and inspection programs. Also, we continued offering workplace flexibilities like telecommuting/work-at-home for one or two days a week to help alleviate the stress of traveling to work every day and allowing staff to focus on the work products without the distractions of the workplace, as well as, helping us attract and retain staff.

Since the periodic review, we have continued to look for ways to reduce unnecessary workload. Checklists, in place of narratives, have been implemented for several types of inspections. These checklists reduce the time spent on post- inspection workload. Also, peer reviews of licenses and inspections have been eliminated and replaced with manager review, which tremendously cut down on workload. We also funded and filled a Senior Staff Scientist position, which will ensure there is an opportunity for continued advancement for Technical Staff in the future.

2016 IMPEP Recommendation: The review team recommends that the Division implement a procedure that addresses at a minimum, the means for controlling access to documents that contain sensitive information, within the limits of Louisiana regulations.

To address the recommendation, we initially blocke everyone’s access to license fill except for a few qualified licensing staff immediately after the 2016 IMPEP. Subsequently, the online access to all of the licensing files are blocked. After further discussions with records management and legal staff, access to non-sensitive licensing information was restored to additional Radiation staff. The licensing staff was working with the Department’s records management staff to develop a procedure to better control and monitor access to licensee information. Access will be granted to members of the public, as allowed by law, with specific limitations and controls, which includes detailed contact information about the requester.

Sensitive information is not released. Radiation management staff monitors what is released.

Since the periodic review, no Radiation Records are accessible to the public or non-radiation LDEQ employees. The Emergency & Radiological Services Division Administrator, in conjunction with the Agency Records Management Director, maintains a list of approved Agency Staff that have a need for Radiation records access. This list is periodically reviewed for accuracy and modified for permissions as appropriate. The Manager or Licensing Supervisor manages all radiation public records requests. Each record is reviewed and sensitive information, such has inventory, site radioactive materials map, etc. is redacted from the files. For Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material (PPQRM) files, we have created an

electronic filing system called On-Base. On-Base is not available to the public or non-radiation employees within Louisiana Department of Environmental Quality (LDEQ) and therefore cannot have a public records request.

2016 IMPEP Recommendation: The review team recommends that the Division develops and implements a comprehensive incident and allegation procedure, provides incident and allegations training to the staff, and ensures adequate management supervision in the incident and allegation program.

During the periodic review, to address the recommendation, a senior staff scientist reviewed and updated the standard operating procedures (SOPs) for complaints, allegations, and incidents (CAIs). Training was provided to all staff on the SOPs and the expectations for responding to CAIs. In general, when a CAI comes in, it is reviewed for significance by a supervisor, manager, or staff scientist and then dispatched or assigned to an inspector for follow-up and investigation, as appropriate. Once the inspector has completed the investigation, a report is generated and reviewed by our supervisors and management, as well as, the senior staff scientist responsible for closing out the event in NMED. To ensure adequate management oversight of CAIs, ongoing investigations are routinely discussed during inspector “huddles” to ensure that any issues identified during an investigation are communicated to management, supervisors, and senior staff scientists in a timely manner.

Since the periodic review, the SOP for CAIs has been revised on November 6, 2019, and every two years after, to make it easier for staff to receive and respond to CAIs. Training has been given and continues to be given to staff on updated SOPs. An Online reporting form has been created for anyone that receives a CAIs. Once the on-line form is completed, it is automatically sent to Senior Staff, Manager, Licensing Supervisor, Inspection’s Supervisor, and LDEQ’s Single Point of Contact. Senior Staff and Manager review for NRC reporting requirements and Supervisors assign to inspector for investigation.

B. COMMON PERFORMANCE INDICATORS

I. Technical Staffing and Training

2. Please provide the following organization charts, including names and positions:

   (a) A chart showing positions from the Governor down to the Radiation Control Program Director;

   (b) A chart showing positions of the radiation control program, including management; and

   (c) Equivalent charts for sealed source and device evaluation, low-level radioactive waste and uranium recovery programs, if applicable.

   See attached organization charts.

   Our SSD writers are Jim Pate, Gilberto Cuadra, and Ziad Fahd.
   1.) Jim Pate – can write and review sources and devices.
   2.) Gilberto – he has not been signed off for SSDs. His work is reviewed by Jim Pate and Ziad Fahd.
   3.) Ziad Fahd – he can write and review sources and devices.

3. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) full-time equivalents (FTE) applied to the radioactive materials program by individual. Include the name, position, and, for Agreement States, the fraction of time spent in the following areas: administration, materials licensing & compliance, emergency response, low-level radioactive waste, uranium recovery, other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program.

If consultants were used to carry out the program's radioactive materials responsibilities, include their efforts. The table heading should be:

Name	Position	Area of Effort	FTE%
Adminstration:			
Jeff Dauzat	Administrator		100% Administration
Karen Burgard	Manager		75% Admin,20% Compl, 5% REPR
Judy Schuerman	Environmental Scientist Senior	Regulation Development, Special Projects	80% Regs, 15% Special Projects, 5% REPR
James Pate	Environmental Scientist Staff		50%Compl, 20% Admin, 25% Hazwpr, 5% REPR
Ashley Menard	Environmental Scientist Staff		70%Compl,20% MQSA, 5%Admin, 5% REPR
Richard Scott Blackwell	Supervisor	Licensing & Registrations, Surveillance, LLW	40% Admin, 20% Lic & Reg, 20% Compl, 10% MQSA, 5% REPR, 5% LLW
Dwayne Stepter	Supervisor	Surveillance	50% Compl, 45% Admin, 5% REPR
Licensing & Registration:			
Tiffany White	Environmental Scientist 4	Licensing & Registrations	95% Lic & Reg, 5% REPR
Melanie Bauder	Environmental Scientist 3	Licensing & Registrations	95% Lic & Reg, 5% REPR
Gilberto Cuadra	Environmental Scientist 3	Licensing & Registrations	95% Lic & Reg, 5% REPR
Ziad Fahd	Environmental Scientist 3	Licensing & Registrations	95% Lic & Reg, 5% REPR
Macy Blanchard	Environmental Scientist 3	Licensing & Registrations	95% Lic & Reg, 5% REPR
Surveillance:			
Jennifer Elee	Environmental Scientist 4	Surveillance	75% Compl, 20% MQSA, 5% REPR
Paula Lang	Environmental Scientist 3	Surveillance	95% Compl, 5% REPR
John Fontenot	Environmental Scientist 3	Surveillance	95% Compl, 5% REPR
Russell Clark	Environmental Scientist 3	Surveillance	95% Compl, 5% REPR
Angela Jackson	Environmental Scientist 3	Surveillance	95% Compl, 5% REPR
Clayton Smith	Environmental Scientist 2	Surveillance X-ray	95% Compl, 5% REPR
Sal Ange	Environmental Scientist 3	Surveillance 90% X-ray, 10% RAM (NGauges)	95% Compl, 5% REPR
Jonathan Crain	Environmental Scientist 1	Surveillance	95% Compl, 5% REPR
Hannah Jones	Environmental Scientist 1	Surveillance X-ray	95% Compl, 5% REPR
Sarah Trahan	Environmental Scientist 1	Surveillance X-ray	95% Compl, 5% REPR
Enforcement:			
Kelly O'Neal	Environmental Scientist 3	Enforcement	95% Enforcement, 5% REPR
Emergency Planning & Response (REPR):			
Jerry Lang	Manager		25% Admin, 40% ER, 15% REPR, 15% CAPP, 5% SPOC
Brad Schexnayder	Supervisor	REPR	50% REPR, 25% CAPP, 25% SPOC

Jessica Walker	ES3	REPR	100% REPR
Cliff Acosta	ES3	REPR	100% REPR
Jamie Dismukes	ES3	REPR	100% REPR

[1]Estimated burden per response to comply with this voluntary collection request: 53 hours. Forward comments regarding burden estimate to the Records Management Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0183), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

4. Please provide a listing of all new professional personnel hired into your radioactive materials program since the last review, indicate the date of hire; the degree(s) they received, if applicable; additional training; and years of experience in health physics or other disciplines, as appropriate.

New Personnel	**Date of Hire**	**Degrees, add'l training, years experience in health physics or other disciplines**
Jeff Dauzat	Hired on with DEQ-5/30/1989, ERSD Administrator-10/23/2017	B.S. in Wildlife Conservation, M.S. in Industrial Hygiene
Sal Ange	January 14, 2019	B.S. in Animal Science, FEMA Incident Command Courses 100, 200, 700, 800, 40-HR HAZWOPER, NRC Courses: Inspection Procedures, Indus Radiography H-305, Intro to Health Physics H-117S, Fund HP H-122S, Nuclear Medicine H-304
Macy Blanchard	February 11, 2019	BS in Natural Resource Ecology & Management, FEMA Incident Command Courses 100, 200, 700, 800, 40-HR HAZWOPER, NRC Courses: Licensing Procedures, Intro to HP, Nuclear Medicine H-304, Internal Dos H-312,
Jonathan Crain	June 6, 2016	BS in Biology, FEMA Incident Command Courses 100, 200, 300, 400, 700, 800, 40-HR HAZWOPER & Refreshers, RERO, NRC Courses: Inspection Procedures, Licensing Procedures, Root Cause, Environmental Monitoring, Intro to HP, Air Sampling, MARSSIM H-121, 80-Hr Fund HP I&II H-122, Advanced HP H-201, Nuclear Medicine H-304, Indus Radiography H-305, Transp of RAM H-308, Brachyth/Gamma H-313, Well Logging H-314, Materials Control S-201,
Angela Jackson	September 12, 2016	B.S. in Biology, FEMA Incident Command Courses 100, 200, 300, 400, 700, 800, 40-HR HAZWOPER & Refreshers, RERO, NRC Courses:

		Inspection Procedures, Licensing Procedures, Root Cause, Environmental Monitoring, Intro to HP, Nuclear Medicine H-304, Indus Radiography H-305, Transp of RAM H-308, Brachyth/Gamma H-313, Well Logging H-314, Materials Control S-201,,
Hannah Jones	November 4, 2019	B.S. in Biological Sciences - Radiological Accident Assessment Concepts (RAAC) Course, HazMat 40-hr, FEMA 100, 200, 700, 800, 300, NRC Courses: H-117 Intro to Health Physics, DEQ X-Ray Inspection Training
Elizabeth Levy	July 2, 2018 Moved to remediation in July 2020	B.S. in Earth and Environmental Sciences, dual focus in Coastal Studies and Geology, MSc Graduate Certificate in Geology and Applied Depositional Basin Analysis, Trained independent user and researcher at the LSU Synchrotron facility (Center for Advanced Microstructures and Devices). Published an x-ray technique using the Synchrotron, a spectrometer, and a partial least squared regression to quantify Fe 2+/3+ ratios in minerals. FEMA Incident Command Courses 100, 200, 700, 800, 40-HR HAZWOPER & Refreshers, RERO, NRC Courses: Inspection Procedures, Root Cause, Intro to HP, Nuclear Medicine H-304, Indus Radiography H-305, Well Logging H-314
Clayton Smith	August 12, 2019	B. S. in Physics, FEMA Incident Command Courses 100, 200, 300, 400, 700, 800, 40-HR HazMat Technician, Radiological Emergency Preparedness Program and Planning, Radiological Accident Assessment Concepts, Radiological Emergency Response Operations, Ludlum Measurements Calibration and Repair of Instruments, DOE TEPP Modular Emergency Response Radiological Transportation Training-Train the Trainer, DOE TEPP Radiation Specialist, Domestic Nuclear Detection Office

		Quick Start-Train the Trainer, Introduction to Radiographic Imaging & Radiologic Physics (MQSA), Fundamentals of MQSA Inspections, NRC Courses: Inspection Procedures G-108, Introductory Health Physics H-117, Fundamental Health Physics H-122S, Diagnostic and Therapeutic Nuclear Medicine (H-304), Transportation of Radioactive Materials H-308S, Internal Dosimetry H-312S
Charles Strawn	August 27, 2016 Resigned November 2020	B.S. in Biology with a concentration in natural science, FEMA Incident Command Courses 100, 200, 300, 400, 700, 800, 40-HR HAZWOPER & Refreshers, RERO, NRC Courses: Inspection Procedures, Root Cause, Environmental Monitoring, Intro to HP, MARSSIM H-121, 80-Hr Fund HP I&II H-122, Nuclear Medicine H-304, Indus Radiography H-305, Transp of RAM H-308, Brachyth/Gamma H-313, Well Logging H-314, Materials Control S-201,
Sarah Trahan	December 16, 2019	Bachelor of Science in Radiologic Technology licensed and registered with ARRT and LSRT. 13.5 years as an x-ray technologist, FEMA Incident Command Courses 100, 200, 300, 400, 700, 800, 40-HR HAZWOPER

5. Please list all professional staff who have not yet met the qualification requirements for a radioactive materials license reviewer or inspector. For each, list the courses or equivalent training/experience they need and a tentative schedule for completion of these requirements.

Radiation Training Procedure has additional information and will be available to the IMPEP Review Team. Training for license reviewers and inspectors not qualified or partially qualified is pursued on an as available/needed basis to allow current and future needs. We progress most license reviewers and inspectors through the full range of qualifications.

Course	K. Burgard	M. Bauder	S. Blackwell	Z. Fahd	T. White	G. Cuadra	M. Blanchard
HP for Uranium Recovery F-104							
Inspection Procedures G-108			Sep-02	Sep-08			
Licensing Procedures G-109	Feb-02	Sep-05	Mar-11	Mar-10	Oct-15	Apr-16	Oct-19
Root Cause G-205				Oct-16	Oct-16		
Environmental Monitoring H-111					Nov-18	May-18	
Decommissioning H-115				Nov-12	Feb-19		
Intro HP H-117	Apr-20	Feb-20		Feb-10	Feb-14	Sep-19	May-19
Air Sampling H-119				May-14	May-16	May-17	
MARSAME H-120							
MARSSIM H-121				Feb-11	Feb-16		
80-Hr Fund HP I&II H-122							S 4/16/2020
Fund HP III H-123							
Advanced HP H-201							
Nuclear Medicine H-304	Aug-05	Aug-06	Mar-00	Aug-09	Mar-15	Aug-18	
Industrial Radiography H-305	Sep-04	Dec-07	Apr-04	Dec-07	Oct-14	Mar-17	
Transportation of RAM H-308	Mar-12	Sep-10	Apr-00	Oct-12	Jul-14	Jul-16	
Internal Dosimetry H-312			Apr-20	Dec-11	Dec-16		
Brachyther&Gamma Kn H-313	Oct-06	Aug-14	Mar-04	Aug-15	Mar-15	Apr-19	
Well Logging H-314	Sep-13	Sep-13	May-00	Apr-11	Sep-14	Apr-16	
RESRAD H-410							
RESRAD Offsite H-411							
Visual Sampling Plan H-500				Oct-10	Apr-17		
Materials Control S-201	Mar-11	Mar-11	Oct-06	Aug-09	May-15	Aug-19	
Nuclear Pharmacy	Aug-10						
NSTS	Dec-08	Dec-08	Dec-08				
SS&D G-116				Sep-11		Jun-17	
NORM 40 Hour	Jul-04						
RERO	Nov-09	Nov-09	Mar-99	Jun-00	Mar-14		
Advanced RERO				Dec-09			
Selected Topics Rad Eng	Jan-02		Dec-98	Comp			
5 Week Course			Jul-05				
HAZWPR 40 hour	Jan-06	May-06	Dec-98	Jun-92	Mar-14	Nov-92	Feb-19
HAZWPR Refresher	Jun-18	Jun-18	Jul-18	Jan-19	Nov-18	Jan-19	
MQSA I			May-99				
MQSA II			Jun-99				
MQSA III			Jul-99				
MQSARef							
MISC	NARM		NMED May-01				
MISC	40 hr Rad Safety		RAAC; RASCAL				
Employment Date	Aug-01	Jun-05	Jul-98	Jan-92	Oct-13	Oct-92	Feb-19

SURVEILLANCE

Course	J. Pate	R. Clark	D. Stepter	J. Elee	A. Menard	J. Schuerman	J. Fontenot	P. Lang	J. Crain	A. Jackson	S. Ange	C. Smith	H. Jones	S. Trahan
MARSSIM H-121	May-02	Aug-12					Feb-12		Feb-17					
80-Hr Fund HP I&II H-122								Jun-16	Jul-18		Mar-20			
Fund HP III H-123								Feb-17						
Advanced HP H-201	May-00	Jun-99							Oct-18					
Nuclear Medicine H-304	Aug-07	Jul-96	Aug-97	Mar-95	Aug-11		Mar-06	May-16	May-17	Mar-17				
Indus Radiography H-305	Aug-99	Jun-98	Sep-06	Jun-08	Oct-10	Mar-17	Dec-07	Jan-17	Jan-17	Jan-17	Oct-19			
Transp of RAM H-308	Apr-99	Dec-95	Apr-99	Sep-09	Sep-10	Nov-15	Mar-12	Sep-15	Sep-17	Sep-17				
Internal Dosimetry H-312	Dec-11	Dec-12			Jan-16							Apr-20		
Brachyth/Gamma H-313	Jun-14	Jun-13		Mar-08	Dec-13		Nov-07	May-17	Apr-19	Mar-17				
Well Logging H-314	Nov-98	May-98	May-99	Oct-11	Apr-11	Oct-11	Nov-07	Apr-18	Apr-17	Apr-17				
RESRAD H-410	Apr-11													
RESRAD Offsite H-411		Aug-15												
Visual Sampling Plan H-500	Oct-10	Aug-14												
Materials Control S-201	Sep-18	Apr-08	Jun-06	Jan-09	Aug-10	Sep-18	May-06	Aug-17	Sep-18	Aug-18				
Nuclear Pharmacy		Sep-10	Aug-10		Sep-10									
NSTS	Dec-08						Dec-08							
SS&D G-116	May-09					Apr-14						Aug-20		
NORM 40 Hour		May-94	Feb-94											
RERO	Jul-97	Jan-94	Sep-94	Jul-97	Apr-09	Oct-09	Jan-08	Nov-15	Sep-16	Feb-17				
Advanced RERO														
Selected Topics Rad Eng		Apr-08	Comp		Feb-11		Comp							
5 Week Course		Jul-95					Jul-05							
HAZWPR 40 hour	Oct-98	May-95	Feb-94	Dec-96	Oct-08	Aug-98	Jul-93	Aug-15	Jul-16	Oct-16	Feb-19		Dec-19	Jan-20
HAZWPR Refresher	Mar-18	Nov-17	Apr-18	Sep-17	May-17	Aug-18	Aug-18	Mar-18	May-18	Oct-17				
MQSA I		Feb-95		Tested	Tested			Tested						
MQSA II				Jun-94	Tested			Tested						
MQSA III				Nov-94	Apr-12			Apr-16						
MQSARef				May-96										
MISC	RAAC			WIPP Training	ER Training							H-301S 6/5/20		
MISC	RASCAL		FDA Diagnostic X-ray	FDA Diagnostic X-ray										
Employment Date	Aug-96	Sep-93	Feb-94	Jul-93	Aug-08	Jul-98	May-03	Jul-15	Jun-16	Sep-16	Jan-19	Aug-19	Nov-19	Dec-19

6. Identify any changes to your qualification and training procedure that occurred during the review period.

We have updated our training policies for license reviewer and inspectors. Changes include a more thorough explanation of the training progression. This describes what the license writer/inspector responsibility is with documentation, sign-offs, and etc. The *Training Policy for License Writers* within the Radiation Section and *Training Policy of Surveillance Personnel* within the Radiation Surveillance Section will be made available to the IMPEP Review Team

7. Please identify the technical staff that left your radioactive materials program during the review period and indicate the date they left.

Departures:	Date:
Bryan Riche	10/13/2017 -Resigned
Joseph Noble	9/1/2019 - Retired
Mark Chrisman	12/31/2019- Retired
Tiffany Rushing	10/31/2018- Texas DHH
Kristen Bonds	5/12/2018 –Private Industry
David Day	7/8/2017-USCOE
Jamie Dismukes	9/8/2019 – transfer to LDEQ REPR
Tim Butler	7/23/2016- Utah State DEQ Radiation
Daniel Phan	6/29/2019-NASA
Elizabeth Levy	7/25/2020- Transfer to LDEQ Remediation
Charles Strawn	11/13/2020 - Teaching

8. List any vacant positions in your radioactive materials program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

We currently have two vacancies. SERO (Elizabeth Levy) position has been vacant since July 25, 2020. Due to COVID-19, we are unable to fill this position at this time. NWRO (Charles Strawn) has been vacant since November 13, 2020. We are in the process of filling this position.

9. For Agreement States, does your program have an oversight board or committee which provides direction to the program and is composed of licensees and/or members of the public? If so, please describe the procedures used to avoid any potential conflict of interest.

We do not have an oversight board or committee. Physicists and RSOs are contacted as needed.

II. Status of Materials Inspection Program

10. Please identify individual licensees or categories of licensees the State is inspecting less frequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 and explain the reason for the difference. The list only needs to include the following information: license category or licensee name and license number, your inspection interval, and rationale for the difference.

All inspections are being conducted in accordance with the IMC 2800 inspection frequency.

11. Please provide the number of routine inspections of Priority 1, 2, and 3 licensees, as defined in IMC 2800 and the number of initial inspections that were completed during each year of the review period.

Categories	FISCAL YEAR 2016	2017	2018	2019	2020	2021	Total
Initial Inspections	4	9	19	7	5	3	47
Routine Inspections Priority 1,2,3	63	148	188	138	148	30	715
Routine Diagnostic Nuclear Medicine	3	35	56	36	14	9	153
Routine Nuclear Gauge	15	56	62	18	38	19	208
Increased Control Inspections	28	72	76	63	66	15	320
Initial Inspections conducted over 6 months	1	4	9	6	10	2	32
Initial Inspections conducted over 12 months	0	0	0	1	1	0	2
Routine 1,2,3 inspections conducted overdue	0	0	0	0	1	6	7
Increased Control Insp. conducted overdue	0	0	0	0	0	0	0
Industrial Radiography Field Inspections	3	14	25	25	4	7	71

Fiscal 2016 = 3/31/16 - 6/30/16
Fiscal 2017 = 7/1/16 - 6/30/17
Fiscal 2018 = 7/1/17 - 6/30/18
Fiscal 2019 = 7/1/18 - 6/30/19
Fiscal 2020 = 7/1/19 - 6/30/20
Fiscal 2021 = 7/1/20 - 10/31/20

12. Please submit a table, or a computer printout, that identifies inspections of Priority 1, 2, and 3 licensees and initial inspections that were conducted overdue.

At a minimum, the list should include the following information for each inspection that was conducted overdue during the review period:

(1) Licensee Name
(2) License Number
(3) Priority (IMC 2800)
(4) Last inspection date or license issuance date, if initial inspection
(5) Date Due
(6) Date Performed
(7) Amount of Time Overdue
(8) Date inspection findings issued

Initial Inspections

AI	Issued	Inspected	by 6 months	by 12 month	Region	License Numbe	Licensee	Type of Lic	Expiration	Address	City	ST	Parish	ZIP
212720	7/24/2018	8/22/2019	No	No	CRO	LA-13740-L01	Premier Geotech and Testing LLC	Nuclar Gauge	7/31/2023	9434 Interline Ave	Baton Rouge	LA	E Baton Rouge	70809
219060	10/10/2019		No	No	ARO	LA-13941-L01	Belle Quality Testing LLC	IR	10/31/2024	215 Foxglove Drive	Patterson	LA	St. Mary	70392

Premier Geotech and Testing LLC was performed a month late due to SWRO Inspector was unqualified to perform RAM inspections (mainly Industrial Radiography inspections) at the time. CRO was performing Cat 1 and 2 inspections in SWRO, which was pulling them from CRO area.

Belle Quality Testing LLC is late due to COVID-19 and Hurricane Laura. It has been scheduled several times within the last few months and canceled due to Hurricane Laura and Belle Quality Testing employees testing positive for COVID-19.

13. Please submit a table or computer printout that identifies any Priority 1, 2, and 3 licensees and initial inspections that are currently overdue, per IMC 2800. At a minimum, the list should include the same information for each overdue inspection provided for Question 12 plus your action plan for completing the inspection. Also, include your plan for completing the overdue inspections.

The following inspections are currently past their due dates. Six of the included inspections are currently overdue, according to IMC 2800. These inspections are overdue because of the COVID-19 pandemic. Charles Strawn, the inspector in the NWRO has resigned. The inspections that were assigned to him have been reassigned to new inspectors and moved to the top of their priority list to be completed ASAP.

Inspections Currently Overdue Highlighted inspections are overdue as per IMC2800.

AI	Date Due	Date Inspected	Priority Code	Amout of time past due date (months)	Region	License Number	Licensee	Type of Lic	Expiration	Address	City	ST	Parish	ZIP
196065	10/12/2019	6/12/2020	1	8	CRO	LA-13278-	AAA Qual	Industrial Radiography		15094 Hw	Gonzales	LA	Ascension	70737
195884	3/20/2020		1	8	NWRO	LA-12228-	Marco Ins	IR		7832 High	Keatchie	LA	DeSoto	71046
154740	2/12/2020		1	9	NWRO	LA-2970-L	H & H X-ra	IR		3804 Kare	Bossier Ci	LA	Bossier	71111
11285	5/2/2020		1	6	NWRO	LA-3773-L	Technical	IR		1810 Bart	Shrevepo	LA	Caddo	71107
38871	5/2/2020		1	6	NWRO	LA-3773-L	Technical	IR		740 N Mar	Shrevepo	LA	Caddo	71107
208459	4/24/2020		1	7	CRO	LA-12236-	IRISNDT Ir	IR		10058 Ind	Gonzales	LA	Ascension	70737
189149	5/8/2020		1	6	CRO	LA-13104-	Intertek	IR		11723 Sun	Baton Rou	LA	E Baton Ro	70821

14. Please provide the number of reciprocity licensees that were candidates for inspection per year as described in IMC 1220 and indicate the number of reciprocity inspections of candidate licensees that were completed each year during the review period.

YEAR	# of candidates	# of inspections	Percentage
2016	45	12	26
2017	62	18	29
2018	63	24	38
2019	73	17	23
2020	57	14	25

III. Technical Quality of Inspections

15. What, if any, changes were made to your written inspection procedures during the reporting period?

We developed checklists to replace some of our narratives for better efficiency and consistency. We updated reciprocity procedures and revised 17 standard operating procedures (similar to IMC 2800; not Inspection Procedures). These procedures will be made available to the IMPEP Review Team.

16. Prepare a table showing the number and types of supervisory accompaniments made during the review period. Include:

Inspector	Supervisor	License Category	Date	Start Date of Employment	End Date of Employment
Tim Butler	Dwayne Stepter	IR	6/6/2016	7/2011	7/23/2016
Kristen Bonds	James Pate	Nuclear Medicine	11/5/2016	8/2014	5/12/18
Kristen Bonds	Dwayne Stepter	Nuclear Medicine	4/18/2017	8/2014	5/12/18
Kristen Bonds	Jeff Dauzat	Nuclear Medicine	12/15/2017	8/2014	5/12/18
Kristen Bonds	Scott Blackwell	Therapy/HDR/Brachy	4/10/2018	8/2014	5/12/18
Daniel Phan	James Pate	Portable Gauge	2/27/2018	3/2017	6/29/19
Daniel Phan	Jeff Dauzat	Portable Gauge	6/1/2018	3/2017	6/29/19
Daniel Phan	Scott Blackwell	Nuclear Medicine	6/12/2018	3/2017	6/29/19
Daniel Phan	James Pate	Nuclear Pharm	11/7/2018	3/2017	6/29/19
Daniel Phan	James Pate	IR	12/4/2018	3/2017	6/29/19

Daniel Phan	James Pate	M&D	6/11/2019	3/2017	6/29/19
Angela Jackson	James Pate	Nuclear Medicine	10/26/2017	9/2016	
Angela Jackson	Jeff Dauzat	Nuclear Medicine	6/6/2018	9/2016	
Angela Jackson	James Pate	Nuclear Pharm	6/19/2019	9/2016	
Angela Jackson	Karen Burgard	Nuclear Medicine	10/22/2019	9/2016	
Angela Jackson	James Pate	I.R. &PPQRM	5/29/2020	9/2016	
Elizabeth Levy	James Pate	IR	5/16/2019	7/2018	7/25/2020
Elizabeth Levy	James Pate	Well Logging	5/21/2019	7/2018	7/25/2020
Elizabeth Levy	James Pate	Fixed Gauge	7/23/2019	7/2018	7/25/2020
Elizabeth Levy	James Pate	Portable Gauge	10/1/2019	7/2018	7/25/2020
Russell Clark	Joe Noble	Commercial PET	2/8/2016	9/1993	
Russell Clark	Judy Schuerman	Fixed Gauge	6/16/2016	9/1993	
Russell Clark	Judy Schuerman	IR	3/1/2017	9/1993	
Russell Clark	Dwayne Stepter	Fixed Gauge	8/10/2017	9/1993	
Russell Clark	Jeff Dauzat	IR	4/20/2018	9/1993	
Russell Clark	Judy Schuerman	IR	5/2/2018	9/1993	
Russell Clark	Scott Blackwell	IR	10/3/2019	9/1993	
Russell Clark	Scott Blackwell	IR	12/11/2019	9/1993	
Paula Lang	James Pate	Nuclear Medicine	11/9/2016	7/2015	
Paula Lang	Judy Schuerman	Nuclear Medicine	4/6/2017	7/2015	
Paula Lang	D. Stepter	Nuclear Medicine	8/24/2017	7/2015	
Paula Lang	Scott Blackwell	Nuclear Pharm	2/7/2018	7/2015	
Paula Lang	Jeff Dauzat	Nuclear Med-Broadscope	3/5/2018	7/2015	
Paula Lang	Karen Burgard	Nuclear Medicine	8/27/2019	7/2015	
Paula Lang	Karen Burgard	Nuclear Medicine	11/5/2019	7/2015	
Paula Lang	Ashley Menard	HDR	1/16/2020	7/2015	
Paula Lang	Scott Blackwell	IR	2/12/2020	7/2015	
Jamie Dismukes	James Pate	Portable Gauges	12/28/2016	4/2016	9/8/2019
Jamie Dismukes	Judy Schuerman	Portable Gauges	8/4/2017	4/2016	9/8/2019
Jamie Dismukes	Judy Schuerman	Portable Gauges	10/13/2017	4/2016	9/8/2019
Jamie Dismukes	Jeff Dauzat	Portable Gauges	2/26/2018	4/2016	9/8/2019
Jamie Dismukes	James Pate	IR	5/18/2018	4/2016	9/8/2019
Jamie Dismukes	James Pate	Nuclear Medicine	5/31/2018	4/2016	9/8/2019
Jamie Dismukes	Karen Burgard	Portable Gauges	8/22/2019	4/2016	9/8/2019
Ziad Fahd	Judy Schuerman	Recp-IR	11/21/2017	1/1992	
Ziad Fahd	Judy Schuerman	Recp-Fixed Gauges	2/21/2018	1/1992	
Ziad Fahd	Jeff Dauzat	Recp-HDR source exchange	8/7/2018	1/1992	
Ziad Fahd	Karen Burgard	Recp-HDR source exchange	9/25/2019	1/1992	
Ziad Fahd	Judy	Recp- Port. Gauge	10/31/201	1/1992	

	Schuerman		9		
Ziad Fahd	Judy Schuerman	Recp- IR	2/20/2020	1/1992	
Jonathan Crain	James Pate	Portable Gauge	6/21/2018	6/2016	
Jonathan Crain	Jeff Dauzat	Portable Gauge	10/8/2018	6/2016	
Jonathan Crain	James Pate	Fixed Gauge	10/10/2018	6/2016	
Jonathan Crain	Scott Blackwell	Nuclear Medicine	1/30/2019	6/2016	
Jonathan Crain	Karen Burgard	Portable Gauge	6/17/2019	6/2016	
John Fontenot	Bryan Riche	IR	7/8/2016	5/2003	
John Fontenot	Bryan Riche	Well Logging	11/28/2016	5/2003	
John Fontenot	Dwayne Stepter	IR & PPQRM	4/5/2017	5/2003	
John Fontenot	James Pate	Manufacturer	11/8/2017	5/2003	
John Fontenot	Judy Schuerman	Well Logging	3/22/2018	5/2003	
John Fontenot	Jeff Dauzat	IR	5/9/2018	5/2003	
John Fontenot	Karen Burgard	IR	5/22/2019	5/2003	
John Fontenot	Dwayne Stepter	IR	9/26/2019	5/2003	
John Fontenot	Karen Burgard	Well Logging	3/10/2020	5/2003	
Ashley Menard	Bryan Riche	Nuclear Medicine	7/15/2016	8/2008	
Ashley Menard	Bryan Riche	Nuclear Pharm	12/1/2016	8/2008	
Ashley Menard	Bryan Riche	Nuclear Medicine	4/24/2017	8/2008	
Ashley Menard	Dwayne Stepter	Nuclear Medicine	8/1/2017	8/2008	
Ashley Menard	Judy Schuerman	Broadscope Academic	3/22/2018	8/2008	
Ashley Menard	Jeff Dauzat	Nuclear Medicine	5/1/2018	8/2008	
Ashley Menard	Dwayne Stepter	Nuclear Medicine	4/11/2019	8/2008	
Ashley Menard	Karen Burgard	HDR,Therapy, Nuc Med	4/24/2019	8/2008	
Ashley Menard	Karen Burgard	I-131 Therapy	11/2/2020	8/2008	
Tiffany Rushing	James Pate	Nuclear Medicine	3/15/2017	12/2015	10/31/18
Tiffany Rushing	James Pate	Fixed Gauge	9/21/2017	12/2015	10/31/18
Tiffany Rushing	James Pate	IR	11/7/2017	12/2015	10/31/18
Tiffany Rushing	Dwayne Stepter	Nuclear Medicine	4/12/2018	12/2015	10/31/18
Sal Ange	James Pate	Portable Gauge	12/3/2019	1/14/19	
Sal Ange	James Pate	IR & PPQRM	6/4/2020	1/14/19	
Mark Chrisman	James Pate	Nuclear Medicine	4/5/2016	4/1996	12/31/19
Mark Chrisman	James Pate	Portable Gauge	9/20/2016	4/1996	12/31/19
Mark Chrisman	James Pate	Blood Irradiator	4/18/2017	4/1996	12/31/19
Mark Chrisman	James Pate	Portable Gauge	9/19/2017	4/1996	12/31/19
Mark Chrisman	James Pate	Portable Gauge	4/3/2018	4/1996	12/31/19
Mark Chrisman	Jeff Dauzat	IR	7/27/2018	4/1996	12/31/19
Mark Chrisman	James Pate	IR	4/16/2019	4/1996	12/31/19
Mark Chrisman	James Pate	Portable Gauge	9/10/2019	4/1996	12/31/19
Charles Strawn	James Pate	Portable Gauge	4/18/2017	8/2016	11/13/20
Charles Strawn	James Pate	Fixed Gauge	7/30/2017	8/2016	
Charles Strawn	James Pate	Nuclear Medicine	9/19/2017	8/2016	
Charles Strawn	James Pate	Nuc Med w/ Therapy	4/3/2018	8/2016	
Charles Strawn	James Pate	IR	4/5/2018	8/2016	

Charles Strawn	Jeff Dauzat	Nuclear Medicine	7/30/2018	8/2016	
Charles Strawn	James Pate	HDR-Brachy	8/21/2018	8/2016	
Charles Strawn	Karen Burgard	IR	4/30/2019	8/2016	
Charles Strawn	James Pate	Nuclear Medicine	9/10/2019	8/2016	
Charles Strawn	Karen Burgard	Nuclear Medicine	3/3/2020	8/2016	11/13/20
Jennifer Elee	James Pate	Nuclear Medicine	3/29/2016	7/1993	
Jennifer Elee	James Pate	Portable Gauge	9/29/2016	7/1993	
Jennifer Elee	Bryan Riche	Nuclear Pharm	2/10/2017	7/1993	
Jennifer Elee	Dwayne Stepter	Portable Gauge	9/28/2017	7/1993	
Jennifer Elee	Dwayne Stepter	Nuclear Pharm	6/28/2018	7/1993	
Jennifer Elee	Jeff Dauzat	Consulting Service	6/29/2018	7/1993	
Jennifer Elee	Karen Burgard	IR	4/29/2019	7/1993	
Jennifer Elee	Dwayne Stepter	Nuclear Medicine	10/29/2019	7/1993	
Jennifer Elee	Karen Burgard	Portable Gauge	3/4/2020	7/1993	

17. Describe or provide an update on your instrumentation, methods of calibration, and laboratory capabilities. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available throughout the review period?

    All radiation protection hardware we rely on for measurements are sent to a certified calibration facility (LSU Nuclear Science Center, Gulf Engineering, and KLS Physics Group) for calibration. All instruments used are properly calibrated at the present time. Instrument calibrations records will be available for the IMPEP team members to review. All radiation inspectors possess/maintain a sufficient amount of calibrated instruments throughout the review period in order to conduct his or her inspections.

IV. Technical Quality of Licensing Actions

18. How many specific radioactive material licenses does your program regulate at this time?

    434 (10/30/2020)

19. Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period.

    ISOFLEX, LA-13526-L01

20. Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.

    None

21. What, if any, changes were made in your written licensing procedures (new procedures, updates, policy memoranda, etc.) during the reporting period?

    Changes to licensing conditions are the only changes made to licensing procedures. I have contacted Michelle Beardsley on the licensing conditions. We are in the process of submitting all of these license conditions for approval or using already approved standard conditions.

GAUGES-

Online internet training from an Agreement State or NRC approved course for portable nuclear gauge safety training must be followed by hands on training from the Radiation Safety Officer or Manufacturer prior to the use of the gauge. A written record of the hands on training shall be maintained for inspection by the Department.

MEDICAL—

1--Old condition listed as:

For patients who have received therapeutic amounts of radionuclides, the provisions of NCRP Report No. 37, "Precautions in the Management of Patients Who Have Received Therapeutic Amounts of Radionuclides," shall govern:

A. hospital and nursing care; and

B. release from the hospital, which may be authorized only by those physicians named in Condition 2 for the specified therapy procedures.

New condition updated to reflect NUREG now listed as:

For patients who have received therapeutic amounts of radionuclides, the provisions of US NRC Regulatory Guide 8.39 shall govern:

A. hospital and nursing care; and

B. release from the hospital, which may be authorized only by individuals listed in Condition 2 above for the mentioned therapy procedures.

INDUSTRIAL RADIOGRAPHY—

1--Old condition listed as:

Pursuant to LAC 33:XV.575.A., the licensee may permit an individual to act as a radiographer provided:

A. Verification of satisfactory completion has been received from a person approved by the Department, an Agreement State, or the Nuclear Regulatory Commission to conduct a radiography training program which meets the requirements equivalent to LAC 33:XV.575.A.1. If verification cannot be received, then the licensee may accept verification from the holder of a license issued by the Department, an Agreement State or the Nuclear Regulatory Commission that the individual has been employed as a radiographer as defined by LAC 33:XV.503; and

B. The individual has received instruction and training which meets the requirements of LAC 33:XV.575.A.2 and 3 as specified in the licensee's Operating and Emergency Procedures; and

C. Appropriate records are maintained which demonstrate the individual has met the above requirements, and Form DRC-20 has been filed with the Department.

D. The individual has successfully completed within the past five (5) years a radiation safety examination administered by the Department or its agent. The examination must be successfully completed at least once every five (5) years.

E. On-the-job training at temporary jobsites shall be under the direct personal supervision of the instructors listed in Attachment 1.

New condition with regulations directly referencing Chapter 5 removed now listed as:

On-the-job training received to act as a radiographer shall be under the direct personal supervision of the instructors listed in Attachment 1 of this license.

2--Old condition for licenses that teach 40-hour rad safety course listed as:

A. Pursuant to LAC 33:XV.575, the licensee is specifically authorized to train and qualify individuals as radiographers. Notification announcing the dates of the class must be submitted to the Department at least two (2) weeks in advance.

B. The licensee shall instruct individuals in the subjects outlined in Appendix A of Chapter 5 of the Louisiana Radiation Regulations in accordance with the course outline dated insert date. Instruction shall be given by insert instructor.

C. On-the job training shall be under the direct personal supervision of the instructors listed in Attachment 1.

D. Form DRC-20 shall be filed with the Department for each individual qualified under this license to act as a radiographer.

E. The individual has successfully completed within the last five years a radiation safety examination administered by the Department or its agent.

New condition with regulations directly referencing Chapter 5 removed now listed as:

A. Pursuant to LAC 33:XV.575, the licensee is specifically authorized to train and qualify individuals as radiographers. Notification announcing the dates of the class must be submitted to the Department at least two (2) weeks in advance.

B. The licensee shall instruct individuals in the subjects outlined in Appendix A of Chapter 5 of the Louisiana Radiation Regulations in accordance with the course outline dated insert date. Instruction shall be given by insert instructor.

3--Old condition listed as:

Tests for leakage and/or contamination of sealed sources listed in the schedule shall be performed in accordance with LAC 33:XV.544.

New condition updated to address items not referenced in 544 now listed as:

Tests for leakage and/or contamination of sealed sources listed in the schedule for industrial radiography shall be performed in accordance with LAC 33:XV.544 using approved leak test kits and procedures specified in the Licensee's application.

4--Old condition listed as:

The licensee is authorized to receive, possess and transfer depleted uranium for use as shielding material in amounts not greater than 999 kilograms.

New condition now reflects actual amount of depleted uranium + 500 kg.
**add'l 500 kg in order to account for any device additions made to the license but du amount accidentally not updated at that time in an effort to keep licensee in compliance

5--Old conditions listed separately as:

Each licensee or registrant shall conduct a program of internal inspections to ensure that the Louisiana Radiation Regulations, Louisiana Radioactive Material License Conditions, and the licensee's or registrant's operation and emergency procedures are followed by each radiographer. Each radiographer will be inspected at least quarterly.

-and-

The licensee shall conduct a quarterly inventory and inspection of all devices containing radioactive material which determines the general physical condition of all devices. Records shall be maintained for inspection by the Department for three years and shall include, but not be limited to, the date of the inventory, the location and identification of the devices, the quantity and kinds of radioactive material, the sealed source identity, the findings of the physical inspection, and name of individual(s) performing the inspection and inventory.

New condition combined and now listed as:

Any irregularities or equipment malfunction observed during the quarterly inventory or inspection of all devices containing radioactive material shall be reported to the Department in accordance with LAC 33:XV.341.

6--Old condition listed as:

The Licensee shall perform a misconnect test in accordance with the manufacturer’s recommendations. Records shall be maintained for inspection by the Department for three years and shall include, but not be limited to, the date, the name of the person who performed the test and the device serial number.

New condition to address third party equipment now listed as:

The Licensee shall perform a misconnect test in accordance with the manufacturer’s recommendations. If third party equipment is utilized, then a **daily** misconnect test shall be performed. Records shall be maintained for inspection by the Department for three years and shall include, but not be limited to, the date, the name of the person who performed the test and the device serial number.

****The following conditions were removed because directly referenced in Chapter 5:**

Each radioactive exposure device, sealed source storage container, and source changer shall be locked in accordance with LAC 33:XV.541 and 542.

Each licensee shall maintain a utilization log per LAC 33:XV.546.

Radioactive material shall only be used by employees of this license, who have received specific instruction in the use of the devices and in radiation protection by the manufacturer or by persons approved by the Department, an Agreement State, or the U. S. Nuclear Regulatory Commission, and have been designated by the Radiation Safety Officer of this license.

****The following condition was removed because no longer accurate:**

The licensee is authorized to receive, possess, and use sealed sources of Cobalt-60 and Iridium-192 where the radioactivity exceeds the amount of radioactivity specified in this license provided:

A. Such sources do not exceed the quantity specified per source by more than 10% for Cobalt-60 or 20% for Iridium-192;

B. Records of the licensee show that no more than the maximum amount of radioactivity specified per source above was ordered from the supplier or transferor of the radioactive material; and

B. Levels of radiation for radiographic source containers and storage containers do not exceed those specified in LAC 33:XV.540.

22. Identify by licensee name and license number any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.

1) Louisiana Department of Health OPH Laboratory
LA-1320-L01B
Expired: 11/30/2018
Renewal Finalized: 4/27/2020
Reasons for delay: lab relocation, multiple source updates, and personnel changes
Notice of Deficiency Issued

2) Pioneer Wireline Services, LLC
LA-12304-L01
Expired: 3/31/2019
Renewal Finalized: 4/27/2020
Reasons for delay: initial request to terminate then requested to renew; relocation and close out, multiple source updates, and personnel changes
Four 90 day letter extensions issued

V. Technical Quality of Incident and Allegation Activities

23. For Agreement States, please provide a list of any reportable incidents not previously submitted to NRC (See Procedure SA-300, *Reporting Material Events*, for additional guidance, OMB clearance number 3150-0178). The list should be in the following format:

Licensee Name	License #	Date of Incident/Report	Type of Incident

None

24. Identify any changes to your procedures for responding to incidents and allegations that occurred during the period of this review.

No changes to the responding procedures in Incidents and Allegations SOP have been made during this IMPEP time period. These procedures will be made available to the IMPEP Review Team.

C. NON-COMMON PERFORMANCE INDICATORS

I. Legislation, Regulations and Other Program Elements Requirements

25. Please list all currently effective legislation that affects the radiation control program. Denote any legislation that was enacted or amended during the review period.

R.S 30.2001 et.seq. LR 29:2053 (October 2003), amended by the Office of the Secretary, Legal Division, LR 43:952 (May 2017). It authorized a 10% increase in fees collected by the Department.

26. Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.

LDEQ is subject to a sunset law. Act 25 of the 2018 Legislative Session became effective on June 30, 2018 and expires July 1, 2023.

27. Please review and verify that the information in the enclosed State Regulation Status (SRS) sheet is correct. For those regulations that have not been adopted by the State, explain why they were not adopted, and discuss actions being taken to adopt them. If legally binding requirements were used in lieu of regulations and they have not been reviewed by NRC for compatibility, please describe their use.

The information in the enclosed SRS sheet is correct. All recently required regulations have been adopted by Louisiana before the stated deadlines. Louisiana has updated some conditions, see question 21 above. We have contacted Michelle Beardsley with the NRC and working on submitting these changes for NRC approval.

28. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated to complete each step.

Since the 2016 IMPEP review, Louisiana has met all regulatory adoption deadlines. Louisiana typically adopts all amendments before the three-year deadline. RATS IDs 2018-1, 2018-3, 2019-1, 2019-2, 2020-1, 2020-2, and 2020-3 should all be adopted into Part XV of Title 33 of the Louisiana Administrative Code before each of these deadlines occurs.

The two NRC comments from RATS ID 2015-3, as well as the 10 comments from 10 CFR 34, will all be addressed in the next rulemaking package that is sent to the NRC in 2021. The main focus of this rulemaking package is to maintain equivalency with NRC regulations promulgated in RATS ID 2018-1.

With regard to comments #2, 4, and 10 from the NRC letter dated March 2, 2020 relating to 10 CFR 34 and LAC 33:XV.Chapter 5:

#2. Definition: Independent Certifying Agency. Louisiana omits a definition of “Independent certifying agency…” 10 CFR 34.3 does not have a definition for “Independent certifying agency” either. There are definitions for “Independent certifying organization” and “Certifying entity” in both 10 CFR 34.3 and LAC 33:XV.503 that are identical to each other. Michelle Beardsley has been contacted on how to proceed with this discrepancy.

#4. Labeling, storage, and transportation. Louisiana’s regulations contain the following additional requirement which is not included in 10 CFR 34.35, and is more restrictive than NRC regulations…Louisiana will remove this additional requirement.

#10. Radiographer certification. Louisiana regulations contain equivalent provisions to 10 CFR Part 34, Appendix A, in their definition of “Certifying Entity...” Louisiana will reference our equivalent regulations, i.e., Appendices A, B, and C in our definition of “Certifying Entity.”

II. Sealed Source and Device (SS&D) Evaluation Program

29. Prepare a table listing new and amended (including transfers to inactive status) SS&D registrations of sources and devices issued during the review period. The table heading should be:

SS&D Registry Number	Manufacturer, Distributor or Custom User	Product Type or Use	Date Issued	Type of Action

LA-1491- S-101-S	LA-13516-L01	205374	Manufacturer/Distributor: ISOFLEX Radioactive LLC	(A) Industrial Radiography (Source)	January 11, 2019, Corrected	New
SS&D Registry Number	License Numbe	Interest N	Manufacturer, Distributor, or	Product Type or Use	Date Issued	Type of Actio
LA-1491- S-102-S	LA-13516-L01	205374	Manufacturer/Distributor: ISOFLEX Radioactive LLC	(A) Industrial Radiography (Source)	April 24, 2019	New
LA-1491- S-101-S	LA-13516-L01	205374	Manufacturer/Distributor: ISOFLEX Radioactive LLC	(D) Gamma Gauges & (T) Other: Research (So	September 28, 2018	Amended
LA-0612-S-123-S	LA-2966-L01	38844	Manufacturer/Distributor: Source Production and Equipment	(AC) Photon-emitting Remote Afterloaders (Bra	June 26, 2018	Amended
LA-0612-S-124-S	LA-2966-L01	38844	Manufacturer/Distributor: Source Production and Equipment	(F) Well Logging (source)	August 1, 2017	New
LA-0612-S-123-S	LA-2966-L01	38844	Manufacturer/Distributor: Source Production and Equipment	(AC) Photon-emitting Remote Afterloaders (Bra	July 20, 2017	Amended
LA-0612-S-123-S	LA-2966-L01	38844	Manufacturer/Distributor: Source Production and Equipment	(AC) Photon-emitting Remote Afterloaders (Bra	February 24, 2017	New
LA-0612-S-122-S	LA-2966-L01	38844	Manufacturer/Distributor: Source Production and Equipment	(AC) Photon-emitting Remote Afterloaders (Bra	February 20, 2017	New
LA-0612-S-121-S	LA-2966-L01	38844	Manufacturer/Distributor: Source Production and Equipment	(AC) Photon-emitting Remote Afterloaders (Bra	February 16, 2017	New
LA-0612-D-119-S	LA-2966-L01	38844	Manufacturer/Distributor: Source Production and Equipment	(A) Industrial Radiography	November 4, 2016	New
LA-0612-S-120-S	LA-2966-L01	38844	Manufacturer/Distributor: Source Production and Equipment	(A) Industrial Radiography	November 4, 2016	New
LA-1394-S-101-S	LA-13205-L01	194287	Distributor: Eckert & Ziegler BEBIG, Inc.	(AC) Photon-emitting Remote Afterloaders (HD	April 30, 2016	New
LA-1394-S-102-S	LA-13205-L01	194287	Distributor: Eckert & Ziegler BEBIG, Inc.	(AC) Photon-emitting Remote Afterloaders (HD	April 30, 2016	New

30. Please include information on the following questions in Section A, as they apply to the SS&D Program:

Technical Staffing and Training - Questions 2-9

The SS&D Training procedure will be provided to the IMPEP Review Team.

Technical Quality of Licensing Actions - Questions 18-22

4 SS&Ds completed for this IMPEP. Nothing major, unusual, or complex. No variances or exemptions requested or granted. No changes to the written procedure. Nothing-pending one year or more.

Technical Quality of Incident and Allegation Activities - Questions 23-24

None

III. Low-level Radioactive Waste Disposal Program

31. Please include information on the following questions in Section A, as they apply to the Low-Level Radioactive Waste Disposal Program:

Louisiana is a member state of the Central Interstate Low-Level Radioactive Waste Commission. Participation includes attending the annual meeting and keeping up with any changes that occur in our and other programs. The Louisiana representative for this program is Richard S. Blackwell.

The department is involved in NORM waste disposal. Further information can be provided, if required.

IV. Uranium Recovery Program

32. Please include information on the following questions in Section A, as they apply to the Uranium Recovery Program:

Louisiana is not involved in the uranium mill program.

MATERIALS REQUESTED TO BE AVAILABLE FOR
THE ON-SITE PORTION OF AN IMPEP REVIEW

Please have the following information available for use by the IMPEP review team when they arrive at your office:

- List of open license cases, with date of original request, and dates of follow-up actions. Will provide this when IMPEP begins.
- List of licenses terminated during review period. *Termination Licenses*Termination Licenses.xlsx
- Copy of current log or other document used to track licensing actions. We have changed the way we track. Prior to this October they were done on paper tracking mail log (these can be provided upon request) and our database tracking list (see *Radiation – Licenses Issued*). Now Scott tracks them in excel from start to finish (also can be provided).
- List of all licensing actions completed during the review period (sorted by license reviewer, if possible). *Radiation – Licenses Issued* Radiation - Licenses Issued.xlsx
- Copy of current log or other document used to track inspections. This is a continuous "live" worksheet. We have provided a glimpse of what we have now. RAM Due List IMPEP.xlsx
- List of all inspections completed during the review period (sorted by inspector, if possible). *Radiation – Inspections* Radiation - Inspections.xlsx
- List of inspection frequencies by license type. *List of Inspection frequencies by type* List of Inspection frequencies by type.docx
- List of all allegations occurring during the review period. Show whether the allegation is open or closed and whether it was referred by NRC. *Allegation Log 2016* Allegation Log 2016.pdf, *Allegation Log 2017*Allegation Log 2017.pdf, *Allegation Log 2018*Allegation Log 2018.pdf, *ALLE Log 2019*ALLE LOG 2019(1).xlsx, *Allegation Log 2020* Allegation Log 2020.xlsx
- List of all licenses that your agency has imposed additional security requirements upon.PPQRM-Security Licenses List.xlsx

PLEASE HAVE THE FOLLOWING DOCUMENTS AVAILABLE

- All State regulations
- Statutes affecting the regulatory authority of the State program
- Standard license conditions
- Technical procedures for licensing, model licenses, review guides
- SS&D review procedures, guides, and standards
- Instrument calibration records
- Inspection procedures and guides
- Inspection report forms
- Documented training plan, if applicable
- Records of results of supervisory accompaniments of inspectors
- Emergency plan and communications list
- Procedures for investigating allegations
- Procedures for investigating incidents
- Enforcement procedures, including procedures for escalated enforcement, severity levels, civil penalties (as applicable)
- Job descriptions